

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC**

In the matter of:	)	
	)	
Adding a "Tyro" License Class to the	)	RM-11829
Amateur Radio Service.	)	
	)	

**COMMENTS OF REC NETWORKS  
AND MICHELLE BRADLEY, KU3N**

1. REC Networks (REC) is a leading advocate for a citizen's access to spectrum. This includes issues related to the Amateur Radio Service. REC's founder, Michelle Bradley, KU3N, holds an Amateur Extra class license and has been licensed since 1987.

**A. OVERVIEW**

2. In the above captioned petition (Petition), Gary A. Hampton (petitioner) is proposing a new license class, supposedly within the Amateur Radio Service which consists of 79 paired narrowband channels and 20 simplex narrowband channels in the spectrum 430~431 and 438.75~440.00 MHz.<sup>1</sup> The petition calls for an on-line licensing process "proctored by a ham mentor with a Technician Class license or higher" in a manner similar to how a General Mobile Radio Service (GMRS) license is achieved today.<sup>2</sup> The testing syllabus consists of "radio etiquette and usage rules" thus disregarding the "physics" of the radio art, which the Petitioner says, "comes later".<sup>3</sup> The Tyro band plan calls for specific channels to be used for specific purposes and dictates specific features in repeater controllers.<sup>4</sup> Tyro radio transmitters are limited to 20 watts with restricted remote control however, "more advanced radios" can be used

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<sup>1</sup> - *Petition* at 1

<sup>2</sup> - *Id.* at 3. GMRS licenses are obtained through the Commission's Universal License System and they do not require any kind of an examination as is required in the Amateur Radio Service.

<sup>3</sup> - *Id.* at 3-4.

<sup>4</sup> - *Id.* at 4-8.

“with adequate supervision”.<sup>5</sup> The Tyro proposal adds not just new repeaters but also new responsibilities to volunteer frequency coordinators.<sup>6</sup>

**B. THE PROPOSED SERVICE WILL INTERFERE WITH EXISTING WELL-ESTABLISHED AND ACTIVE OPERATIONS**

The petition proposes operation in portions of the 430~440 MHz band in which the Petitioner suggests that Amateur Radio has a primary allocation in (as compared to 440~450 MHz). This statement is not exactly accurate. While many administrations allocate spectrum in the 430~440 MHz band to Amateur Radio, the Amateur service only has a primary designation in ITU Region 1 and within that region, Amateur is co-primary with the Radiolocation service. In ITU Regions 2 and 3, the Amateur service is secondary to the Radiolocation service.<sup>7</sup>

The band plan of the American Radio Relay League (ARRL) which serves as guidance for frequency coordinators designates the proposed Tyro spectrum between 430~431 and 438.75-440.00 as being in spectrum that is used by amateur television (ATV).<sup>8</sup>

In the region administrated by the Southern California Repeater and Remote Base Association (SCRRBA), the 430~431 spectrum is used both by ATV and by coordinated paired 20 kHz control links. The spectrum from 438.75~440.00 includes the edge of the primary ATV channel that is used for repeater inputs in Southern California (using the spectrum from 433.0~439 MHz).<sup>9</sup> In Southern California, 6 ATV repeaters use the 433-439 MHz for ATV.<sup>10</sup> The entire 439~440 MHz band in Southern California is very active with point to point control links.

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<sup>5</sup> - *Id.* at 5.

<sup>6</sup> - *Id.* at 28.

<sup>7</sup> - See 47 C.F.R. §2.106

<sup>8</sup> - See <http://www.arrl.org/band-plan> retrieved March 15, 2019.

<sup>9</sup> - See <http://www.scrba.org/BandPlans/420-440.pdf> retrieved March 15, 2019.

<sup>10</sup> - See <http://www.scrba.org/BandPlans/scATVmap.pdf> retrieved March 15, 2019.

In the region administered by the The Mid-Atlantic Repeater Council (T-MARC), the 438.75~440 MHz band is used in the Baltimore area for the output of an ATV repeater.

In other states, spectrum in the 430~431 and 438.75~440.00 MHz bands are used for various purposes including control links for repeaters and for ATV. Since the control links are not directly accessible to end users (they are intended for sending traffic between two repeaters or auxiliary stations), they are not published by the frequency coordinators.<sup>11</sup>

### C. CONCLUSION

The service proposed is not needed. The existing Technician Class license does offer full access to all VHF and UHF spectrum. In many parts of the country (including here in the Delmarva Peninsula), the VHF and UHF bands, especially 1.25 meters is well underutilized. The current Technician Class examination is fairly simple and covers the items necessary to operate an amateur radio station (including the “physics”). Because of the limited modes of this proposed service, we fail to see how it can support science, technology, engineering and math (STEM). This is mostly a voice-based service, similar to Citizens Band and GMRS. If anything, much of what is being requested here can be satisfied in the underutilized GMRS. If the Petitioner wants to create a new citizen’s band, please find spectrum that is not at the expense and the integrity of the established Amateur Radio Service. It is REC’s position that the Commission should not move this *Petition* forward to a *Notice of Inquiry* or a *Notice of Proposed Rulemaking*. It simply will not work.

Respectfully submitted,  
/S/  
Michelle Bradley, KU3N  
Founder  
REC Networks  
11541 Riverton Wharf Rd.  
Mardela Springs, MD 21837  
<https://recnet.com>

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<sup>11</sup> - This same assumption that just because individual repeaters or other systems are not itemized in directories for a particular piece of spectrum does not necessarily mean that the spectrum is not being used. This was one of the assumptions that resulted in the Amateur Radio Service losing the spectrum from 220~222 MHz.